

1 MORGAN, LEWIS & BOCKIUS LLP
2 FRANKLIN BROCKWAY GOWDY, (SBN 047918)
3 BENJAMIN P. SMITH, (SBN 197551)
4 One Market, Spear Street Tower
5 San Francisco, CA 94105-1126
Tel: 415.442.1000
Fax: 415.442.1001
fgowdy@morganlewis.com
bpsmith@morganlewis.com

6 Attorneys for Non-Parties
7 Palm, Inc. and Edward Colligan

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10
11 IN RE HIGH-TECH EMPLOYEE
12 ANTITRUST LITIGATION

13 Case No. 11-CV-2509-LHK

14
15 I, Edward T. Colligan, declare as follows:
16 1. I am the former President and Chief Executive Officer of Palm, Inc. ("Palm"). I
17 have personal knowledge of the facts set forth in this declaration and if called upon to do so I
18 could and would competently testify to such matters.
19 2. I served as President of Palm from June 12, 2004 to June 12, 2009. I served as the
20 Chief Executive Officer of Palm from May 16, 2005 to June 12, 2009. From October 2003 to
21 June 2004, I served as Senior Vice President and General Manager of the Wireless Business Unit
22 of Palm. Before joining Palm in October 2003, I served as co-founder, President, and Chief
23 Executive Officer of Handspring, Inc. ("Handspring"). Between October 1998 and July 2001, I
24 served as Senior Vice President of marketing and sales at Handspring. From January 1993 to
25 September 1998, I was the Senior Vice President of marketing at Palm. From 1986 to 1993, I
26 worked for Radius, Inc., serving as its Vice President of Strategic and Product Marketing. I have
27 a BA in Political Science from the University of Oregon.
28 3. Part of my job at Palm was to build and retain a team of highly skilled employees

1 with technical expertise ("high tech employees").

2 4. During my tenure at Palm, Apple, Inc. ("Apple") hired Palm employees, including
3 high tech employees, and Palm hired Apple employees, including high tech employees.

4 5. During my tenure at Palm, [REDACTED]

5 [REDACTED] Both before and after 2007, Apple and Palm were competitors in the mobile
6 phone market.

7 6. [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 7. [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 8. [REDACTED]

19 [REDACTED]

20 The foregoing statements are true, of my own personal knowledge except where otherwise
21 indicated, and if called as a witness I could and would competently so testify. I declare under
22 penalty of perjury under the laws of that the foregoing is true and correct. Executed on
23 Aug 7th, 2012 in Santa Cruz, California.

24

25

26

27

28



Edward T. Colligan